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November 2, 2015

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Remedial Project Managers

USEPA, Region 5

77 W. Jackson Boulevard Chicago, IL 60604-3590

RE:

2015 Annual Progress Report and Master Schedule Update – Revision 0

Peoples Gas Light and Coke Company's Former Manufactured Gas Plant Sites

CERCLA Docket No.: V-W-08-C-917

Dear Mr. del Rosario, Mr. Ryan, Mr. Valentin, Ms. Davison, and Mr. Quadri:

Please find enclosed one hard copy of the 2015 Annual Progress Report and Master Schedule Update for Peoples Gas Light and Coke Company's (PGL) former manufactured gas plant (MGP) sites in Chicago, Illinois. This report summarizes activities performed between October 31, 2014 and October 31, 2015 and provides a proposed schedule for future activities.

This 2015 Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2, of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the United States Environmental Protection Agency (USEPA) and PGL, effective October 31, 2008.

Please do not hesitate to contact Mr. Naren Prasad at 312.240.4569 if you have any questions regarding this document.

Sincerely,

NATURAL RESOURCE TECHNOLOGY, INC.

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VALUE

2015 Annual Progress Report and Master Schedule Update

Remedial Investigation/Feasibility Study Peoples Gas Light and Coke Company Former Manufactured Gas Plant Sites

Project No: 1982

Revision 0

November 2, 2015



ENVIRONMENTAL CONSULTANTS

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FIGURES

Figure 1 Master Schedule



ACRONYMS

ARAR Applicable or Relevant and Appropriate Requirements

BMc Burns and McDonnell

CSM Generalized Conceptual Site Model

FS Feasibility Study

FSP Field Sampling Plan

HASP Health and Safety Plan

IEPA Illinois Environmental Protection Agency

IBS Integrys Business Support, LLC

MGP Manufactured Gas Plant

NRT Natural Resource Technology, Inc.

OU Operable Unit

PGL Peoples Gas Light and Coke Company

PRAP Preliminary Remedial Action Plan

QAPP Quality Assurance Project Plan

RAF Risk Assessment Framework

ROD Record of Decision

RI Remedial Investigation

RPM Remedial Project Manager

SOW Statement of Work

SSWP Site-Specific Work Plan

USEPA U.S. Environmental Protection Agency



1 INTRODUCTION

1.1 Scope

This Annual Progress Report has been prepared in accordance with Task 8, Subtask 8.2 of the Statement of Work (SOW) attached to the Settlement Agreement and Administrative Order on Consent (Settlement Agreement) between the U.S. Environmental Protection Agency (USEPA) and Peoples Gas Light and Coke Company (PGL), effective October 31, 2008 (2008c). Also included in this report is a Master Schedule Update that includes the general schedule for Remedial Investigation/Feasibility Study (RI/FS) activities at each Site. The Annual Progress Report and Master Schedule Update address PGL's former manufactured gas plant (MGP) Sites located in Chicago, Illinois. The sites include: Crawford Station, North Branch Site (consisting of Division Street Station Operable Unit (OU), North Station OU, and Willow Street-Hawthorne Avenue Station OU), North Shore Avenue Station, and South Branch Site (consisting of 22nd Street Station Upland OU, Hough Place Station Upland OU, South Station Upland OU, Throop Street Station OU, Pitney Upland OU, and South Branch River OU).

1.2 Overview

This report addresses the following:

Section 2: Multi-Site Document Progress

Section 3: Site Progress

Section 4: Proposed Master Schedule

Section 5: References



2 MULTI-SITE DOCUMENTS

Under the Settlement Agreement and SOW, Multi-Site documents are used to set forth general approaches and concepts to streamline subsequent site-specific work plans and minimize review times. The Multi-Site RI documents are used to maintain a consistent approach to investigate and assess potential risk at each site. The Multi-Site FS Support Document is used to develop general response actions and technologies appropriate for MGP sites.

This section summarizes the status of the Multi-Site Documents.

2.1 Multi-Site RI Documents

USEPA has approved all Multi-Site RI Documents submitted between May 7, 2007 and September 8, 2008 and subsequent addenda. The Multi-Site RI Documents set forth a consistent approach for WEC Energy Group's Illinois and Wisconsin-based subsidiary companies under the USEPA's lead. Section 1.2.1 of the SOW discusses the Multi-Site RI Documents which include:

- Multi-Site Quality Assurance Project Plan Revision 2, September 4, 2007 (QAPP, 2007(c))
 - Updated Laboratory Usage and Qualification Addendum Test America, submitted for Peoples Gas Light and Coke Company's (PGL) Former Crawford Station MGP on May 7, 2012
 - QAPP Worksheet #28, submitted with response to comments on Site-Specific Work Plan (SSWP), Addendum No. 1, for PGL Division Street Station Former MGP on March 12, 2012
- Multi-Site Health and Safety Plan Revision 2, August 2, 2007 (HASP, 2007(a))
- Generalized Conceptual Site Model Revision 0, August 5, 2007 (CSM, 2007(b))
- Multi-Site Risk Assessment Framework (RAF) Revision 0, September 5, 2007 (RAF, 2007(d))
 - Multi-Site RAF Addendum, April 20, 2011
 - o Multi-Site RAF Addendum Revision 1, March 28, 2013
 - Multi-Site RAF Addendum Revision 2, February 17, 2014 (approved March 10, 2014)



- o Multi-Site RAF Addendum Revision 3, July 30, 2014
- Multi-Site Field Sampling Plan (FSP) Revision 4, September 8, 2008 (FSP, 2008(b))
 - o SAS-12-01 Revision 1, December 2012, approved January 22, 2013
 - SAS-11-06, SAS-11-01, and SAS-11-04 Revisions 1 and SAS-05-05 Revision 3, May 28, 2014, approved July 24, 2014

The Multi-Site RAF Addendum submitted to USEPA on April 20, 2011 (prepared by Exponent, 2011(b)) incorporates the Regional Screening Levels (RSL) into the hierarchy for human health screening levels and further develops the approach to assessing potential vapor intrusion issues. Subsequent Multi-Site RAF Addenda incorporate updates to RSLs which are revised approximately every six months. Not all RSL updates result in a RAF Addenda. For instance, the November 2014 RSL update did not modify RSLs for the MGP constituents of potential concern (COPCs). As part of the RAF Addendum Revision 2, it was acknowledged the RSLs may be modified based on the semi-annual updates, if any, and does not require a formal submittal. In other words, the most current RSLs at the time will be used for comparison of site media.

A Vapor Intrusion (VI) Decision Matrix for the Multi-Site Former MGP Sites was initiated as part of an August 5, 2015 meeting. USEPA provided comments on October 23, 2015, which will be reviewed and incorporated, as appropriate in a revised VI Decision Matrix.

- Illinois MGP Specific Multi-Site Addenda/Topics
 - Addendum No. 1, Revision to Site-Specific Work Plan, Revision 1, Modified Sampling and Analysis Protocols for Slow-Recharge Wells, Hough Place Station Former MGP, Upland OU, South Branch Site, Chicago, Illinois, August 20, 2014 –presents a modified sampling methodology and analytical protocol for slow-recharging wells. Piezometers installed within the native clays at many of the Chicago sites, are slow to recharge and do not produce enough groundwater within a 24 hour period to collect sufficient volume to fill the sample bottles required for analysis of all the groundwater COPCs. The addendum outlines protocol and sampling methods to address the slow recharge and low sample volume. The addendum was approved by the USEPA via e-mail on September 4, 2014 and now applies to other PGL sites in the Multi-site Program.
 - On September 5, 2014, a draft *City of Chicago Background Soil Data Evaluation* was submitted to the USEPA to determine if urban fill soils found at the former MGP sites were characteristic of "background City of Chicago" or indicative of MGP affected soil. This evaluation was completed to address USEPA comments on the Willow-Hawthorne Draft RI Data Summary report. USEPA review is in progress (described in Section 2.3) and the approach is anticipated to be applied to other City of Chicago PGL sites in the Multi-site Program.



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Site-Specific Work Plans (SSWP) are based on the Multi-Site documents and include modifications, as necessary, to reflect site-specific conditions. For instance, the site-specific CSM discusses the pathways presented in the Generalized CSM and why or why not the pathway is carried through into the baseline risk assessment.

2.2 Multi-Site FS Support Document

USEPA has approved (USEPA, 2010(d)) the Multi-Site FS Support Document dated March 26, 2010 (FS Support Document, 2010(c)). The Multi-Site FS Support Document includes general response actions and preliminary remedial technologies.

SOW Section 1.2.2 discusses the Multi-Site FS Support Document which includes:

- Preliminary Remedial Technology Screening
- Preliminary List of Possible Applicable or Relevant and Appropriate Requirements (ARARs)
- Preliminary Permitting/Equivalency Requirements

Site-Specific FS evaluations and the Detailed Analysis of Alternatives (FS Report) for each site are based on the Multi-Site FS Support Document. In addition, USEPA's comments on FS related documents for North Shore Gas Company (NSG) South Plant MGP and WPSC's Manitowoc MGP are incorporated into each FS. Major deviations from the FS Support Document include providing individual remedial options for each media to be assembled by USEPA (not assembling remedial alternatives) for the Site as a whole and providing volumes/cost estimates for each of three cancer risk ranges (10⁻⁶, 10⁻⁵, and 10⁻⁴).

2.3 Multi-Site Document Status

All Multi-Site Documents and addenda, if applicable, submitted to date have been approved by the USEPA, with the exception of the VI Decision Matrix, discussed above.

As mentioned above, a Draft City of Chicago Background Soil Data Evaluation Memorandum, specific to the PGL Sites, was submitted to USEPA on September 5, 2014 as part of the Willow-Hawthorne Site. Partial USEPA comments were provided on October 30, 2014 with additional comments provided April 7, 2015. A response to USEPA comments was provided May 22, 2015 and additional USEPA comments were received July 27, 2015. Draft responses to USEPA's July 27, 2015 comments were submitted August 19, 2015 and additional guidance regarding background soil screening for arsenic was provided by USEPA on September 3, 2015. However, arsenic background was left unresolved until additional



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discussion on September 8, 2015. Final comments will be incorporated in the Memorandum, Revision 0 to be resubmitted in November 2015.

Multi-Site RAF Addenda will continue to be submitted to acknowledge updates to the Regional Screening Levels (RSL), generally on a semi-annual basis. The most current version of the RSLs is used in the hierarchal human health screening values.

2.4 Multi-Site Meetings

During this reporting period, a multi-site meeting was conducted on January 22, June 17, and September 8, 2015 to discuss overall progress, success, and improvements. As discussed above, a VI Decision Matrix meeting was held on August 5, 2015.

On June 17, 2015, USEPA and PGL discussed modifying the schedule for submitting the Site-Specific Alternatives Screening Technical Memorandum and the FS Report. Modifications include submitting the Alternatives Screening Technical Memorandum 60 days after submitting RI Report – Revision 1, rather than Revision 0 and submitting the FS Report – Revision 0, 70 days after receiving USEPA comments on the Alternatives Screening Technical Memorandum, rather than 45 days. These proposed modifications are documented in a July 9, 2015 letter to USEPA.

Site specific meetings were held as discussed in Section 3.



3 SITE PROGRESS

Project start dates and site prioritization for RI/FS activities were established in Exhibit A, Section A, of the Settlement Agreement (2008(c)). Project start dates were established for the North Branch Site – Division Street Station OU, South Branch Site – South Station Upland OU, North Shore Avenue Station Site, and Crawford Station Site. Start dates for the remaining OUs were to be initiated every six months, or as otherwise mutually agreed upon.

The priority of the sites has been modified from the sites identified in the SOW. The South Station Upland OU (South Branch Site), Division Street Station OU (North Branch Site), Willow Street-Hawthorne Avenue Station OU (in lieu of North Shore Avenue Site), North Station (North Branch Site), Crawford Station Site, Throop Street Station Upland OU (South Branch Site), Hough Place Station Upland OU (South Branch Site), and Pitney Court Station Upland OU (South Branch Site), 22nd Street OU (South Branch Site) and North Shore Avenue Station Site were initiated during the 2014 reporting period. The South Branch River OU (South Branch Site) was initiated during this reporting period. In addition to the RI/FS phase, a Time-Critical Removal Action has been initiated at the Crawford Station Site.

The North Branch Sites – Division Street Station OU, Willow Street-Hawthorne Avenue Station OU, and North Station OU were initiated on November 25, 2008, April 28, 2009, and June 15, 2011, respectively, with submittal of the Completion Reports. The South Branch Sites – South Station Upland OU and Throop Street Station Upland OU were initiated on May 13, 2008 and June 20, 2012, respectively, with submittal of the Completion Reports. The South Branch Sites – Hough Place Station Upland OU and Pitney Court Station Upland OU were initiated on March 15, 2013 and August 30, 2013, respectively, with submittal of the Completion Report with SSWP because remediation has been performed at these sites. The South Branch Site - 22nd Street OU and North Shore Avenue Station were initiated on March 17, 2014 and June 19, 2014, respectively, with submittal of the Completion Reports. The South Branch River OU (South Branch Site) was initiated on December 18, 2014, with submittal of the Completion Report. The Crawford Station Site RI/FS was initiated on December 23, 2011 with submittal of the Completion Report. The AOC for a Time-Critical Removal Action for Crawford Station Site was signed on October 13, 2011. Progress on the Time-Critical Removal Action is discussed in weekly progress reports submitted to USEPA and is not included in this RI/FS AOC Annual Progress Report.



RI planning and field activities have been performed as summarized in the following sections during this reporting period. As discussed above, Time-Critical Removal Actions have been performed at the Crawford Station during this reporting period.

The Annual Progress Report is intended to provide a concise summary of the progress of the work completed at each of the MGP sites. As part of the progress report, the anticipated progress (as presented in the SOW and the Master Schedule Update dated October 31, 2014 (2014(j)) is compared to the actual progress.

3.1 Overview Progress Meetings

A program overview meeting was not held during this time period.

3.2 South Station Upland OU (South Branch Site)

The Project Start Date for the South Station Upland OU was established in Exhibit A, Section A, to coincide with the effective date of the Settlement Agreement (2008(c)). However, Completion Report – Revision 0 was submitted on May 13, 2008 (2008(a)), prior to finalizing the Settlement Agreement. Per the SOW, scoping meetings and conference calls may be used to discuss the content of South Station Upland OU site-specific documents.

On September 13, 2011 (2011f), USEPA modified the Settlement Agreement to modify the site boundaries of the South Station Upland OU. The modification excluded Parcels C and D from the Settlement Agreement because review of existing data indicates the source removal has been complete and no further remedial action is planned or anticipated on these parcels.

3.2.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

The RI Report – Revision 0, Alternatives Array Technical Memorandum, and FS Report – Revision 0 have not been submitted as anticipated because of the City of Chicago Background Soil Evaluation Memorandum, and on-going and additional VI evaluations during this reporting period.



Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit RI Report – Revision 0	March 5, 2015 ¹	1	
Submit Alternatives Array Technical Memo to USEPA	May 4, 2015 ²	2	
Submit FS Report – Revision 0	August 17, 2015 ²	2	
Groundwater Monitoring Modifications Request Letter		January 7, 2015	March 16, 2015
RI Data Summary		February 27, 2015	June 3, 2015
Groundwater Monitoring Modifications Request Letter, Revision 1, and response to USEPA's March 16, 2015 comments		June 4, 2015	June 23, 2015
Submit SSWP Addendum 1		July 31, 2015	September 17, 2015
Submit SSWP Addendum 1, Revision 1 and response to USEPA's September 17, 2015 comments	October 2015	October 16, 2015	pending

- 1. Submittal of the RI Report Revision 0 was delayed to incorporate on-going and additional VI evaluations during this reporting period. In addition, the target date assumed no additional RI activities would be identified and the City of Chicago Background Soil Data Evaluation would be approved by January 19, 2015.
- 2. Alternatives Array Technical Memo and FS Report Revision 0 submittal dates will be reestablished pending USEPA comments on the RI Report Revision 1.

3.2.2 Remedial Investigation Field Activities

RI field activities as described in the SSWP (2009(a)) were initiated in May 2009. Continued RI activities performed at the South Station Upland OU during this progress report period, are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Groundwater sampling event	October 2014 January 2015 July 2015	October 7-10, 2014 January 12-21, 2015 July 21-22, 2015
Soil gas sampling event	January 2015	January 12-21, 2015



3.2.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2014	November 13, 2014
November 2014	December 15, 2014
December 2014	January 14, 2015
January 2015	February 13 2015
February 2015	March 13, 2015
March 2015	April 15, 2015
April 2015	May 15, 2015
May 2015	June 17, 2015
June 2015	July 14, 2015
July 2015	August 14, 2015
August 2015	September 15, 2015
September 2015	October 15, 2015

3.3 Division Street Station OU (North Branch Site)

The Project Start Date for the Division Street Station OU was established in Exhibit A, Section A, to coincide with the effective date of the Settlement Agreement (2008(c)) but was re-established to November 25, 2008. Per the SOW, scoping meetings and conference calls may be used to discuss the content of Division Street Station OU site-specific documents. No scoping meetings or conference calls were held during this reporting period.

3.3.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.



Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit response to USEPA's November 13, 2014 comments on Draft RI Data Summary Report	December 11, 2014	December 3, 2014	May 14, 2015
Submit Groundwater Monitoring Plan Modification request		April 17, 2015	June 4, 2015
Submit response to USEPA's June 4, 2015 comments and Groundwater Monitoring Plan Modification Request, Revision 1	July 20, 2015	July 9, 2015	July 24, 2015
Submit response to USEPA's July 24, 2015 comments and Groundwater Monitoring Plan Modification Request, Revision 2	August 24, 2015	August 10, 2015	August 11, 2015 (Approved)
Submit response to USEPA's November 13, 2014 comments on Draft RI Data Summary Report	December 11, 2014	December 3, 2014	May 14, 2015 (Approved)
Submit Site-Specific Work Plan Addendum No.2	June 26, 2015	June 15, 2015	July 30, 2015
Submit Site-Specific Work Plan Addendum No.2, Revision 1	October 5, 2015	October 5, 2015	Pending
Submit RI Report – Revision 0	August 27, 2015 ¹	1	
Submit Alternatives Array Technical Memo to USEPA	October 26, 2015 ¹	1	

^{1.} Submittal of the RI Report – Revision 0 and Alternatives Array Technical Memo was delayed to incorporate supplemental RI field activities and data gaps. The 2014 Master Schedule update assumed USEPA approval of the Site-Specific Work Plan Addendum in April 2015.

3.3.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 1 (2009(c)), and the USEPA-approved SSWP Addendum No. 1 (2012(e)). Completed RI activities during this reporting period are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Semi-annual groundwater sampling	April 2015	September 11, 2015 ¹
Supplemental RI Subsurface Investigation Field Activities	Pending USEPA Approval of Site-Specific Work Plan Addendum No.2, Revision 1	

 Sampling event delayed while USEPA reviewed, commented, and approved the Groundwater Monitoring Plan Modifications, originally summited on April 17, 2015



3.3.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2014	November 12, 2014
November 2014	December 12, 2014
December 2014	January 13, 2015
January 2015	February 13, 2015
February 2015	March 11, 2015
March 2015	April 10, 2015
April 2015	May 14, 2015
May 2015	June 15, 2015
June 2015	July 14, 2015
July 2015	August 14, 2015
August 2015	September 11, 2015
September 2015	October 15, 2015

3.4 Willow Street – Hawthorne Avenue Station OU (North Branch Site)

The Project Start Date for the Willow Street – Hawthorne Avenue Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (2008(c)). The start date was established as April 30, 2009 as summarized in the 2008 to 2009 Annual Progress Report (2009(e)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of Willow Street – Hawthorne Avenue Station OU site-specific documents. A meeting to discuss development and application of City of Chicago soil background data was held during this reporting period as discussed in the following table.

Topic	Date
Meeting with USEPA to review draft City of Chicago Soil Data Evaluation	September 8, 2015



3.4.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table. Please note the City of Chicago Background Soil Data Evaluation included evaluation of the Willow Street – Hawthorne Avenue Station OU. Please refer to Section 2.3 for details.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit RI Report – Revision 0	March 20, 2015 ¹	July 17, 2015 ¹	
Submit Alternatives Array Technical Memo to USEPA	May 19, 2015 ²	2	
Submit FS Report – Revision 0	September 3, 2015 ²	2	

- Submittal of the RI Report Revision 0 was delayed to incorporate the approach of the City of Chicago Background Soil Data Evaluation. The 2014 Master Schedule update assumed USEPA approval of the City of Chicago Background Soil Data Evaluation in January 2015.
- 2. The Alternatives Array Technical Memo and FS Report were delayed pending submittal of RI Report Revision 1, as discussed in Section 2.4.

3.4.2 Remedial Investigation Field Activities

No RI field activities were performed during this reporting period.

3.4.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2014	November 13, 2014
November 2014	December 15, 2014
December 2014	January 13, 2015
January 2015	February 13 2015
February 2015	March 13, 2015
March 2015	April 10, 2015
April 2015	May 14, 2015
May 2015	June 15, 2015



Monthly Progress Report	Submittal Date
June 2015	July 14, 2015
July 2015	August 14, 2015
August 2015	September 14, 2015
September 2015	October 15, 2015

3.5 North Station OU (North Branch Site)

The Project Start Date for the North Station OU was not established in Exhibit A, Section A, of the Settlement Agreement (2008(c)). The start date was established as June 15, 2011 as summarized in the 2010 Annual Progress Report and Master Schedule Update (NRT, 2010(n)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of North Station OU site-specific documents.

No scoping meetings were held this period.

3.5.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit RI Data Summary	November 2014	November 25, 2014	May 14, 2015
Submit RI Report – Revision 0, including responses to USEPA May 14comments on the RI Data Summary	March 5, 2015 ¹	July 17, 2015	pending
Submit Alternatives Array Technical Memo to USEPA	May 4, 2015 ²		
Submit FS Report – Revision 0	September 3, 2015 ²		

- The RI Report Revision 0 submittal date was re-established to July 17, 2015 to incorporate elements of the City of Chicago Background Soil Data Evaluation. The original date of March 5, 2015 assumed USEPA would approve the City of Chicago Background Soil Data Evaluation in January 2015.
- 2. Alternatives Array Technical Memo and FS Report Revision 0 submittal dates will be reestablished pending USEPA comments on the RI Report Revision 1.



3.5.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 1 (2012(p)). Completed RI activities are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Sample wells at LaSalle-Chestnut Parcel that were not sampled in August and September 2014, and sample all wells at ComEd Parcel and collect water level data	August 2014 – delayed due to access issues	November 14, 2014 ¹
Sample wells at ComEd Parcel, Old Town Village West Parcel, and Rights of Way, and collect water level data	February 2015	February 3 through 6, 2015
Sample wells and probes at ComEd Parcel, Old Town Village West Parcel, and Rights of Way, and collect water level data	April to May 2015 – delayed due to access issues	June 8 through 10, 2015 ¹
Sample wells at ComEd Parcel and Rights of Way, and collect water level data	July 2015 – delayed due to access issues	October 19 through 21, 2015 ¹

^{1.} Property access and utility placement issues have prolonged field work for upland RI.

3.5.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2014	November 13, 2014
November 2014	December 15, 2014
December 2014	January 14, 2015
January 2015	February 13 2015
February 2015	March 13, 2015
March 2015	April 15, 2015
April 2015	May 15, 2015
May 2015	June 17, 2015
June 2015	July 14, 2015
July 2015	August 14, 2015
August 2015	September 15, 2015
September 2015	October 15, 2015



3.6 Crawford Station

As previously discussed, PGL and USEPA entered into a Time-Critical AOC on October 13, 2011 to address portions of the site that had MGP residuals at the surface and were accessible for removal. The Time Critical Removal is proceeding under AOC V-W-11-C-981 and, therefore, is not summarized in detail in this report which addresses the RI/FS activities.

The Project Start Date for the Crawford Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (October 31, 2008). The start date was established as December 16, 2011 as summarized in the 2011 Annual Progress Report and Master Schedule Update (2011(h)). Due to the size and multiple property owners at Crawford Station, the site is subdivided into more manageable Parcel Groups in the SSWP. Parcel Groups were mutually identified with USEPA and IBS. Per the SOW, scoping meetings and conference calls may be used to discuss the content of Crawford Station OU site-specific documents.

A progress meeting was held during this reporting period as discussed in the following table.

Topic	Date
Meeting with USEPA and PGL to discuss draft upland RI data summary Group 1	June 10, 2015

3.6.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit SSWP Addendum #2 Group 3 – Revision 0	August 14, 2014	August 14, 2014	May 14, 2015
RI Data Summary Report Group 1	September 14, 2014	September 19, 2014	May 14, 2015
SSWP Addendum #2 Group 3, Revision 1 and response to USEPA's May 14, 2015 comments	July 2, 2015	July 2, 2015 September 17, 2015 (modified)	Pending
Submit RI Report Group I– Revision 0	July 27, 2015 ¹	September 11, 2015 ¹	Pending
Submit Groundwater Modification Letter Request for wells on Parcel Group I and Parcels A&B.		September 25, 2015	Pending
Submit Parcel Group 4 SSWP Addendum – Revision 0	February 12, 2015 ²	2	



- The RI Report Group I Revision 0 submittal date was re-established to September 4, 2015
 to incorporate elements of the City of Chicago Background Soil Data Evaluation. The original
 date of March 5, 2015 assumed USEPA would approve the City of Chicago Background Soil
 Data Evaluation in January 2015. The actual submittal date was subsequently re-established
 to September 11, 2015 to allow ComEd review.
- 2. Target date was mutually re-established after receipt of USEPA's comments on SSWP Addendum #2 and to incorporate South Branch River OU comments into the approach for the river.

3.6.2 Remedial Investigation Field Activities

Parcel Group II RI field investigation activities were targeted to be initiated in May 2014 but is delayed as a result of site access issues. A proposed schedule for RI/FS field investigation activities is proposed in Section 4, including assumptions regarding site access.

RI field activities were performed in Parcel Group I in accordance with USEPA-approved Group I SSWP – Revision 1 (2012(ag)). RI field activities in Parcel Group II are delayed due to site access. Completed RI activities are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
	July 2014 October 2014	July 7-10, 2014 October 13-23, 2014
	January 2015	January 26-29, 2015
Quarterly Groundwater Sampling	·	& February 12-13 2015 ¹
	April 2015	April 13-16, 2015
	July 2015	July 13-15, 2015

3. Delays are in part as a result of site access issues with ComEd.

3.6.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 11th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2014	November 11, 2014
November 2014	December 11, 2014
December 2014	January 10, 2015
January 2015	February 10, 2015
February 2015	March 10, 2015



Monthly Progress Report	Submittal Date
March 2015	April 10, 2015
April 2015	May 10, 2015
May 2015	June 10, 2015
June 2015	July 10, 2015
July 2015	August 11, 2015
August 2015	September 10, 2015
September 2015	October 8, 2015

3.7 Throop Street Station Upland OU (South Branch Site)

The Project Start Date for the Throop Street Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)). The start date was established as June 20, 2012 as summarized in the 2011 Annual Progress Report and Master Schedule Update (2011(h)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of Throop Street Station OU site-specific documents. A progress and RI Data Summary meeting was held for the Throop Street Station OU during this reporting period.

Topic	Date
Meeting with USEPA to discuss RI Data Summary	November 13, 2014

3.7.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit RI Data Summary	October 10, 2014	October 10, 2014	March 19, 2015
Submit Groundwater Sampling Modification Letter	February 2015	February 16, 2015	March 18, 2015
Propose additional RI field activities to address USEPA's March 19, 2015 RI Data Summary Comments		April 22, 2015	April 22, 2015 (approved)
Submit Response to USEPA's March 18, 2015 Comments for Groundwater Sampling Modifications and Throop Groundwater Sampling Modification Letter Revision 1	April 30, 2015	April 30, 2015	May 4, 2015



Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit RI Report – Revision 0	April 6, 2015 ¹	October 29, 2015	
Submit Alternatives Array Technical Memo to USEPA	June 5, 2015 ²	2	
Submit FS Report – Revision 0	September 18, 2015 ²	2	

- The RI Report Revision 0 submittal date will be re-established to incorporate elements of the City of Chicago Background Soil Data Evaluation. The original date of April 6, 2015 assumed USEPA would approve the City of Chicago Background Soil Data Evaluation in January 2015.
- 2. Alternatives Array Technical Memo and FS Report Revision 0 submittal dates will be reestablished pending USEPA comments on the RI Report-Revision 1.

3.7.2 Remedial Investigation Field Activities

RI field activities were performed in accordance with USEPA-approved SSWP – Revision 0 (2012(af)). Completed RI activities are summarized in the following table.

Task	Targeted Completion Date	Actual Completion Date
Quarterly groundwater sampling	December 2014 March 2015 June 2015 September 2015	December 15 through 18, 2014 March 24 through 27, 2015 June 8 through 11, 2015 September 14, 2015
Perform additional RI activities to address USEPA Comments to Throop RI Data Summary and replacement of well P109	May 26, 2015	May 26 through 28, 2015
Soil gas sampling event	June 2015	June 8 through 11, 2015

3.7.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2014	November 12, 2015
November 2014	December 12, 2015
December 2014	January 13, 2015
January 2015	February 13, 2015



Monthly Progress Report	Submittal Date
February 2015	March 11, 2015
March 2015	April 10, 2015
April 2015	May 14, 2015
May 2015	June 12, 2015
June 2015	July 14, 2015
July 2015	August 14, 2015
August 2015	September 11, 2015
September 2015	October 15, 2015

3.8 Hough Place Station Upland OU (South Branch Site)

The Project Start Date for the Hough Place Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)). The start date was established as February 15, 2013 as summarized in the 2012 Annual Progress Report and Master Schedule Update (2012(ai)). Per the SOW, scoping meetings and conference calls may be used to discuss the content of Hough Place Station OU site-specific documents.

No additional meetings were conducted this reporting period.

3.8.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit RI Data Summary -Revision 0	March 25, 2015	March 25, 2015	June 3, 2015
Submit SSWP Addendum No.2 addressing USEPA's June 3, 2015 Comments on Data Summary	July 17, 2015	July 17, 2015	September 17, 2015
Submit Response to USEPA's September 17, 2015 Comments on SSWP Addendum No.2, Revision 1	October 16, 2015	October 16, 2015	Pending
Submit Combined RI/FS Report – Revision 0	August 14, 2015 ¹	1	

^{1.} Target dates assumed supplemental RI activities, as described in the October 16, 2015 SSWP Addendum No. 2, Revision 1, would not be required.



3.8.1 Remedial Investigation Field Activities

Task	Targeted Completion Date	Actual Completion Date
Quarterly groundwater sampling	October 2014 (revised to November 2014) February 2015 May 2015	November 10-11, 2014 February 9-13, 2015 May 13-15, 2015

3.8.2 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2014	November 12, 2014
November 2014	December 12, 2014
December 2014	January 13, 2015
January 2015	February 13, 2015
February 2015	March 11, 2015
March 2015	April 10, 2015
April 2015	May 14, 2015
May 2015	June 12, 2015
June 2015	July 14, 2015
July 2015	August 14, 2015
August 2015	September 11, 2015
September 2015	October 14, 2015

3.9 Pitney Court Station Upland OU (South Branch Site)

The Project Start Date for the Pitney Court Street Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)). The start date was established as January 10, 2014 as summarized in the 2012 Annual Progress Report and Master Schedule Update (2012(m)). However, the Pitney Court Station was initiated in lieu of the North Shore Avenue Station. The North Shore Avenue Station start date was established as July 12, 2013. The Pitney Court Station start date was delayed to August 30, 2013 to allow USEPA additional time to comment on the format of the Hough Place Station OU, which was the first site to proceed with a combined Completion Report with SSWP.



Per the SOW, scoping meetings and conference calls may be used to discuss the content of Pitney Court Station site-specific documents. No additional meetings were conducted this reporting period.

3.9.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Combined RI/FS Report, Revision 0 to USEPA	February 18, 2015 ¹	May 15, 2015	Pending
Submit Addendum to Combined RI/FS Report, Revision 0 to USEPA		June 26, 2015	Pending

The RI/FS Report – Revision 0 submittal date was delayed to incorporate elements of the City of Chicago Background Soil Data Evaluation. The original date of February 18, 2015 assumed USEPA would approve the City of Chicago Background Soil Data Evaluation in January 2015.

3.9.2 Remedial Investigation Field Activities

Task	Targeted Completion Date	Actual Completion Date
Supplemental Soil Gas Sampling	May 2015	May 19, 2015

3.9.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2014	November 12, 2014
November 2014	December 12, 2014
December 2014	January 13, 2015
January 2015	February 13, 2015
February 2015	March 11, 2015
March 2015	April 10, 2015
April 2015	May 14, 2015



Monthly Progress Report	Submittal Date
May 2015	June 12, 2015
June 2015	July 14, 2015
July 2015	August 14, 2015
August 2015	September 11, 2015
September 2015	October 15, 2015

3.10 22nd Street Upland OU (South Branch Site)

The Project Start Date for the 22nd Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)). The start date was established as March 17, 2014 as summarized in the 2013 Annual Progress Report and Master Schedule Update (2013(m)). No pre-scoping meetings or conference calls were completed prior to submittal of Completion Report or during this reporting period.

3.10.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Site-Specific Work Plan, Revision 0 and Response to USEPA's Comments on Completion Report.	June 16, 2014	June 16, 2014	November 3, 2014
Submit SSWP – Revision 1	January 26, 2015	December 18, 2014 ¹	May 14, 2015 (approved)

^{1.} The RI Report – Revision 1 submittal date assumed USEPA comments on Revision 0 would be provided in December 2015 and comments were received in November.

3.10.2 Remedial Investigation Field Activities

No remedial investigation field activities were performed during this reporting period due to site access issues.



3.10.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2014	November 12, 2014
November 2014	December 12, 2014
December 2014	January 13, 2015
January 2015	February 13, 2015
February 2015	March 11, 2015
March 2015	April 10, 2015
April 2015	May 14, 2015
May 2015	June 15, 2015
June 2015	July 13, 2015
July 2015	August 14, 2015
August 2015	September 15, 2015
September 2015	October 14, 2015

3.11 North Shore Avenue Station Site

The Project Start Date for the North Shore Avenue Station OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)). The start date was established as June 19, 2014 as summarized in the 2013 Annual Progress Report and Master Schedule Update (2013(m)). No prescoping meetings or conference calls were completed prior to submittal of the Completion Report.

3.11.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Completion Report – Revision 0	June 19, 2014	June 19, 2014	September 2, 2014
Submit Site-Specific Work Plan, Revision 0 and Response to USEPA's Comments on Completion Report.	October 17, 2014	October 17, 2014	May 6, 2015



Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Site-Specific Work Plan, Revision 1 and Response to USEPA's Comments on Site-Specific Work Plan Revision 0.	January 29, 2015 ¹	June 26, 2015	Pending

The target date assumed USEPA comments on SSWP Revision 0 would be received mid-December 2015.

3.11.2 Remedial Investigation Field Activities

No remedial investigation field activities were performed during this reporting period.

3.11.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.

Monthly Progress Report	Submittal Date
October 2014	November 14, 2014
November 2014	December 14, 2014
December 2014	January 13, 2015
January 2015	February 13, 2015
February 2015	March 11, 2015
March 2015	April 10, 2015
April 2015	May 14, 2015
May 2015	June 15, 2015
June 2015	July 14, 2015
July 2015	August 14, 2015
August 2015	September 15, 2015
September 2015	October 15, 2015

3.12 South Branch River OU (South Branch Site)

The Project Start Date for the South Branch River OU was not established in Exhibit A, Section A, of the RI/FS Settlement Agreement (2008(c)). The start date was established as December 18, 2014 as



summarized in the 2014 Annual Progress Report and Master Schedule Update (2014 (m)).No pre-scoping meetings or conference calls were completed prior to submittal of Completion Report.

3.12.1 Planning Documents and Work Plan Submittals

Planning documents and work plan submittals are summarized in the following table.

Task/Submittal	Targeted Completion Date	Actual Completion Date	USEPA Comments Received
Submit Completion Report – Revision 0	December 18, 2014	December 18, 2014	February 3, 2015
Submit Site-Specific Work Plan, Revision 0 and Response to USEPA's Comments on Completion Report	March 17, 2015	March 17, 2015	May 14, 2015

3.12.2 Remedial Investigation Field Activities

Task/Submittal	Targeted Completion Date	Actual Completion Date
Receive permits	August 2015	September 2015
Site Reconnaissance for sediment investigation	September 2015	September 2015
Surface Water Sampling	October 2015	September 14 through 27, 2015
Sediment Poling	October 2015	September 28 through October 4, 2015
Vibrocore Sampling	December 2015	Initiated October 5, 2015 and ongoing

3.12.3 Monthly Progress Reports

Monthly Progress Reports have been submitted by the 15th of each month (or the following business day) in accordance with Section 8.1 of the SOW.



Monthly Progress Report	Submittal Date
October 2014	November 14, 2014
November 2014	December 14, 2014
December 2014	January 13, 2015
January 2015	February 13, 2015
February 2015	March 11, 2015
March 2015	April 10, 2015
April 2015	May 14, 2015
May 2015	June 15, 2015
June 2015	July 14, 2015
July 2015	August 14, 2015
August 2015	September 15, 2015
September 2015	October 15, 2015



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4 PROPOSED MASTER SCHEDULE

Exhibit A of the SOW includes a schedule for major deliverables. All of the sites have been initiated.

Future submittals and/or activities are dependent on USEPA comments and approvals. The site-specific schedules presented in the SSWPs or supplemental RI activities, are updated herein to provide proposed site-specific schedules for field activities and major deliverables.

4.1 Overview Progress Meetings

Overview progress meetings are proposed to be conducted on an as-needed basis at the request of either USEPA or PGL. Tentatively, the need for a progress meeting to discuss overall site schedules to further stagger deliverables and avoid "stacking" of Records of Decisions has been identified. Specific progress meeting dates are not proposed at this time but are anticipated to be quarterly.

4.2 Multi-Site RI Documents

The Multi-Site Documents, as described in the SOW, have been completed and approved as summarized in Section 2 with the exception of the City of Chicago Background Soil Data Evaluation. Additional Multi-Site Documents are not anticipated at this time. Addendums to the multi-site documents, particularly the QAPP and RAF may be issued, as appropriate, to update programmatic procedures, approaches or screening levels based on updates to RSLs as discussed in Section 2.

4.3 Schedule for PGL Sites

Figure 1 summarizes the proposed target dates for RI/FS activities at each of the sites. The proposed target dates are generally consistent with the schedules provided in the SSWPs, adjusted to reflect current status, USEPA approvals and reasonably anticipated approvals. All site schedules are dependent on USEPA approval dates, contractor availability, and sampling seasons (particularly with respect to sediment sampling activities).

Figure 1 considers the deliverable timeframes specified in Exhibit A of the SOW (e.g., SSWPs submitted 90 days following the Completion Report submittal, finalize submittals within 45 days from receipt of USEPA comments, etc.) and the July 9, 2015 letter regarding Alternatives Array Technical Memorandums



and FS Reports. For planning purposes, this schedule assumes USEPA will provide comments within 60 days of submittals for Revision 0 and provide approvals within 45 days of receiving Revision 1. Exceptions include the USEPA's comments/approval of City of Chicago Background Soil Data Evaluation, Crawford Parcel Group III SSWP – Revision 1, Willow Street – Hawthorne Avenue Station OU RI Report – Revision 0, Pitney Court Station, and North Shore Avenue Station Site-Specific Wok Plan – Revision 1 to recognize USEPA's need for additional time to compile all the comments.

The proposed schedules are subject to change. Modifications to the schedule, if necessary, will be communicated to USEPA through monthly site-specific progress reports, weekly progress conference calls during RI activities, or other communications.

4.3.1 South Station Upland OU (South Branch Site)

The tasks provided in the South Station Upland OU SSWP – Revision 1, dated January 26, 2009 (2009(a)) have been completed up to submittal of the RI Report – Revision 0. Supplemental RI field activities to assess vertical extent are proposed and pending USEPA approval.

These tasks and on-going post RI groundwater monitoring are presented in Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Supplemental RI Field Activities (pending USEPA approval of SSWP Addendum 1 – Revision 1 mid November 2015)	December 2015
Submit RI Report, Rev 0 (assumes no additional RI activities are identified)	September 4, 2016
Alternatives Array Tech Memo to USEPA	February 17, 2017
FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo early April 2017)	June 27, 2017
On-going Post RI Groundwater Monitoring	Semi-annually – January and July 2016



4.3.2 Division Street OU (North Branch Site)

The tasks provided in the Division Street OU SSWP – Revision 1, dated September 21, 2009 (2009(f)), the Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, (2012(ac)) and supplemental RI field activities have been completed. The scope of additional supplemental RI field activities is under review and will be presented in the upcoming Supplemental SSWP.

Major deliverable target dates are presented on Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Initiate Supplemental RI Field Activities - Upland (assumes USEPA approval of scope provided in mid November 2015)	December 2015
Submit RI Report – Revision 0 to USEPA (assumes no additional supplemental RI activities are required)	September 13, 2016
Alternatives Array Tech Memo to USEPA	February 27, 2017
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo April 2017)	July 7, 2017
On-going Post RI Groundwater Monitoring	Semi-Annually

4.3.3 Willow Street – Hawthorne Avenue Station OU (North Branch Site)

The Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 was submitted to USEPA on July 15, 2011 (2011(d)) and conditionally approved on August 30, 2011. The tasks provided in the Willow Street – Hawthorne Avenue Station OU SSWP – Revision 2 (2011(d)) and the Step I Data Evaluation for North Branch Sediment Sampling Technical Memorandum, (2012(ac)), related to the upland areas, have been completed.



Major deliverable target dates are presented on Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Submit RI Report, Rev 1 (assumes no additional RI activities are identified, USEPA provides comments on Rev 0 by mid November 2015, and City of Chicago Background Soil Data Evaluation is approved by December 14, 2015)	January 28, 2016
Alternatives Array Tech Memo to USEPA	March 28, 2016
FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array Tech Memo in April 2016)	August 5, 2016

4.3.4 North Station OU (North Branch Site)

The North Station OU SSWP – Revision 1 was submitted to USEPA on November 28, 2011 (2011(f)) and approved by USEPA on March 20, 2012 (2012(h)). An update to modify the sampling parameters was submitted on June 25, 2012 (2012(p)). Groundwater sampling, per the SSWP and update to modify sampling parameters, is on-going. Major deliverable target dates are presented on Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Submit RI Report – Revision 1 to USEPA (assumes supplemental RI activities are not required, USEPA provides comments on RI Report Revision 0 by mid November 2015, and City of Chicago Background Soil Data Evaluation is approved by December 14, 2015)	February 12, 2016
Alternatives Array Tech Memo to USEPA	April 12, 2016
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in June 2016)	August 22, 2016
On-going Post RI Groundwater Monitoring	Proposed as quarterly until further evaluation



4.3.5 Crawford Station

The project start date for Crawford Station was established as December 15, 2011. A Completion Report (2011(I)) for the entire Crawford Station site has been prepared and submitted to USEPA. Due to the size and multiple property owners at Crawford Station, a phased approach to the RI/FS activities has been proposed and approved by USEPA. Accordingly, the initial SSWP has been prepared to reflect four groups of parcels that will be investigated in a sequential manner during the RI/FS. The Parcel Group 1 SSWP – Revision 1 (2012(ag)) has been submitted and initiated. The Parcel Group 2 SSWP was approved and will be implemented pending site access. The Parcel Group 3 SSWP – Revision 1 was submitted September 17, 2015 and is awaiting USEPA comments/approval. Site specific work plans addressing Parcel Group 4 will be submitted as addenda to the SSWP.

Proposed target dates for future RI/FS activities, are provided as general placeholders for planning purposes only and may be significantly different, depending on USEPA approvals.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
On-going RI Field Activities – Upland Parcels	Quarterly RI Groundwater Monitoring
Submit Parcel Group 1 RI Report – Revision 1 to USEPA (assumes supplemental RI activities are not required and USEPA comments on RI Rev 0 are received November 2015)	January 18, 2016
Parcel Group 1 Alternatives Array Tech Memo to USEPA	March 8, 2016
Submit Parcel Group 1 FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in April 2016)	July 18, 2016
Initiate Parcel Group 2 RI Field Work (assumes Contractor is secured in November 2015)	December 2015
Group 2 RI Report – Revision 0 (assumes supplemental RI activities are not required)	March 27, 2017
Alternatives Array Tech Memo to USEPA	September 8, 2017
Initiate Parcel Group 3 RI Field Work (assumes USEPA approval of Parcel Group 3 SSWP Addendum in November 2015)	March 2016
Submit Parcel Group 3 RI Report – Revision 0 to USEPA (assumes supplemental RI activities are not required)	July 3, 2017
Alternatives Array Tech Memo to USEPA	December 17, 2017



Task/Deliverable	Target Date for Completion
Submit Parcel Group 4 SSWP Addendum – Revision 0	December 9, 2015
Initiate Parcel Group 4 RI Field Work (assumes USEPA approval of Parcel Group 4 SSWP Addendum in April 2016)	June 2016
Submit Parcel Group 4 RI Report – Revision 0 to USEPA (assumes supplemental RI activities are not required)	March 20, 2017

4.3.6 Throop Station OU (South Branch Site)

The project start date for the Throop Station OU (South Branch Site) was established as June 20, 2012. A proposed schedule was developed as part of the SSWP – Revision 0, submitted October 15, 2012 (2012(af)). USEPA approved SSWP – Revision 0 on December 4, 2012. RI field investigation activities were initiated on October 22, 2013. Supplemental RI field activities are proposed at South Station OU and will be relevant to Throop Station OU.

Major deliverable target dates are presented on Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Semi-Annual Groundwater Sampling	March and September
Alternatives Array Tech Memo to USEPA	April 11, 2016
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in early June 2016)	October 24, 2016

4.3.7 Hough Place Station OU (South Branch Site)

The project start date for the Hough Place Station OU (South Branch Site) was established as March 15, 2013. The Completion Report with SSWP – Revision 1 was approved by USEPA on October 30, 2013. RI field activities have been initiated and are on-going.

Major deliverable target dates are presented on Figure 1 and summarized in the following table.



Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Semi-Annual Groundwater Sampling	March and September
Supplemental Soil Borings	December 2015
Submit Combined RI/FS Report – Revision 0 to USEPA (assumes supplemental RI activities are not required)	May 18, 2016
Submit Combined RI/FS Report – Revision 1 to USEPA (assumes USEPA comments received mid July 2016)	September 1, 2016
USEPA Completes Preliminary Remedial Action Plan (PRAP) (assumes USEPA initiates PRAP based on RI/FS Revision 1)	December 14, 2016
USEPA Issues Record of Decision (ROD) (assumes 60 day public review)	May 15, 2017

4.3.8 Pitney Court Station (South Branch Site)

The project start date for the Pitney Court Station OU (South Branch Site) was established as August 30, 2013. The Completion Report with SSWP – Revision 0 was submitted August 30, 2013.

Major deliverable target dates are presented on Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Submit Combined RI/FS Report – Revision 1 to USEPA (assumes supplemental RI activities are not required, USEPA comments on RI/FS Report – Revision 0 are received by the end on November 2015, and City of Chicago Background Soil Data Evaluation is approved by December 14, 2015)	January 28, 2016
USEPA Completes Preliminary Remedial Action Plan (PRAP) (assumes USEPA initiates PRAP based on RI/FS Revision 1)	May 13, 2016
USEPA Issues Record of Decision (ROD) (assumes 60 day public review)	September 12, 2016



4.3.9 22nd Street Station OU (South Branch Site)

The project start date for the 22nd Street Station OU (South Branch Site) was established as March 24, 2014 in the 2013 Annual Progress Report and Master Schedule Update. The Completion Report-Revision 0 was submitted March 24, 2014. The SSWP – Revision 1 was submitted December 18, 2014 and was approved on May 14, 2015.

Major deliverable target dates are presented on Figure 1 and summarized in the following table.

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Initiate RI Field Work (assumes access is secured by end of November 2015)	December 2015-January 2016 – soil borings, groundwater monitoring well installation/development, soil gas probe installation Quarterly RI Groundwater Monitoring – through October 2016
RI Report Revision 0 (assumes no additional RI investigation)	April 3, 2017
Alternatives Array Tech Memo to USEPA	September 15, 2017
Submit FS Report – Revision 0 to USEPA (assumes USEPA comments on Alternatives Array in mid November 2017)	January 23, 2018

4.3.10 North Shore Avenue Station

The project start date for the North Shore Avenue Station was established as June 19, 2014 in the 2013 Annual Progress Report and Master Schedule Update. The Completion Report- Revision 0 was submitted June 19, 2014. The SSWP-Revision 1 was submitted on June 26, 2015 and is currently under USEPA review

Major deliverable target dates are presented on Figure 1 and summarized in the following table.



Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Initiate RI Field Work (assumes USEPA approval of SSWP in November 2015)	January-February 2016 – soil borings, groundwater monitoring well installation/development
	Quarterly RI Groundwater Monitoring – through December 2016
RI Report Revision 0 (assumes no additional RI investigation)	May 8, 2017
Alternatives Array Tech Memo to USEPA	October 27, 2017
Submit FS Report – Revision 0 to USEPA	
(assumes USEPA comments on Alternatives Array in mid December 2017)	February 22, 2018

4.3.11 South Branch River OU

The project start date for the South Branch River OU was established as December 18, 2014 in the 2014 Annual Progress Report and Master Schedule Update. The Completion Report- Revision 0 was submitted December 18, 2014. The SSWP – Revision 0 was submitted March 17, 2015 and approved by USEPA on May 6, 2015

Task/Deliverable	Target Date for Completion
Monthly Progress Reports	15 th of every month
Complete Fall 2015 RI Field Work	December 2015 – complete RI work described in SSWP Revision 0
Submit RI Field Work Technical Memorandum	May 9, 2016
Supplemental Sediment Sampling, if necessary	August-September 2016
RI Report Revision 0 (assumes no additional RI investigation beyond the August-September 2016 event)	March 27, 2017
Alternatives Array Tech Memo to USEPA	September 8, 2017
Submit FS Report – Revision 0 to USEPA	
(assumes USEPA comments on Alternatives Array in mid November 2017)	January 16, 2018



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